

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**SHARON GORE,**

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**Plaintiff,**

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**v.**

**CASE NO.: 3:06-CV-167-WKW**

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**JOE DUBOSE TRUCKING, et al.,**

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**Defendants.**

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**MOTION TO AMEND COMPLAINT**

COMES NOW the Plaintiff, Sharon Gore, the personal representative of the estate of Tullis Gore and moves this Honorable Court for an order permitting her to amend the Complaint in this matter. This Motion to Amend is timely filed under the Scheduling Order governing this action.

The Plaintiff wishes to amend the complaint in order to reflect the proper party defendant as set forth in the Motion for Permission to Substitute filed contemporaneously with this Court. In addition, the Plaintiff is adding wantonness allegations in the complaint.

A copy of the proposed Amended Complaint is attached hereto as Exhibit A.

Respectfully submitted on the 26th day of May, 2006.

/s Randall S. Haynes

Attorney for Plaintiffs (HAY006)

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 26<sup>th</sup> day of May, 2006, I electronically filed the foregoing Motion to Amend Complaint with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record in the above referenced case.

/s Randall S. Haynes  
Of Counsel

cc: Mr. David Lee  
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